

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

KERI INGEMI, Plaintiff, v. DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE FOR MORGAN STANLEY ABS CAPITAL 1 INC. TRUST 2007-SEA1 a/k/a DEUTSCHE BANK NATIONAL TRUST COMPANY AS TRUSTEE FOR MSAC 2007-SEA1, Defendant.	Civil Action No. 12-CV-12285-WGY
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NOTICE OF DELAY REGARDING ASSEMBLY OF STATE COURT RECORD

TO THE HONORABLE WILLIAM G. YOUNG:

DEFENDANT Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2007-SEA1 a/k/a Deutsche Bank National Trust Company as Trustee for MSAC 2007-SEA1 ("**Deutsche Bank**") filed with this Court its Notice of Removal regarding the above-captioned action on December 7, 2012.

Deutsche Bank has attempted to contact the state court, the Southeast Housing Court (Taunton) of the Commonwealth of Massachusetts, to obtain a certified copy of the state court records as well as a certified copy of all docket entries. However, due to staffing issues at the state court, Deutsche Bank has not yet obtained the certified copies for filing with this Court. Deutsche Bank expects to obtain and file the certified copy of the state court record no later than Friday, January 11, 2013 in order to ensure compliance with Local Rule 81.1.

Respectfully submitted,

DEUTSCHE BANK NATIONAL TRUST
COMPANY, AS TRUSTEE FOR MORGAN
STANLEY ABS CAPITAL I INC. TRUST
2007-SEA1 A/K/A DEUTSCHE BANK
NATIONAL TRUST COMPANY AS
TRUSTEE FOR MSAC 2007-SEA1,

By its attorneys,

MICHIEENZIE & SAWIN, LLC,

/s/ Richard C. Demerle

Paul Michienzie (BBO#548701)

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DATE: January 7, 2013

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DISTRICT OF MASSACHUSETTS

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CERTIFICATE OF SERVICE

I, Richard C. Demerle, Esq. of the law firm of Michienzie & Sawin, LLC hereby certify that I have this 7th day of January 2013, served on behalf of Deutsche Bank National Trust Company, as Trustee for Morgan Stanley ABS Capital I Inc. Trust 2007-SEA1 a/k/a Deutsche Bank National Trust Company as Trustee for MSAC 2007-SEA1, a Notice of Delay Regarding Assembly of State Court Record and this Certificate of Service by causing copies hereof to be sent by first-class, U.S. mail, postage pre-paid (M), or via electronic mail (EM), to the following:

Keri Ingemi
234 B Pratt Street
Taunton, MA 02780 (M)

/s/ Richard C. Demerle
Richard C. Demerle